

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

RAMANDA DENISE MCMILLAN

*(Write the full name of each plaintiff who is filing
this complaint. If the names of all the plaintiffs
cannot fit in the space above, please write "see
attached" in the space and attach an additional
page with the full list of names.)*

-against-

EXPERIAN INFORMATION SOLUTIONS, INC.,

CAPITAL ONE FINANCIAL CORPORATION

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Ramanda McMillan		
Street Address	____ 60	Wilder	Street
City and County	Sumter		
State and Zip Code	SC		29150
Telephone Number			

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	____ Experian Information Solutions,
Job or Title	Inc. ____ ("Experian")
(if known)	____ 475 Anton Blvd Costa
Street Address	Mesa
City and County	
State and Zip Code	CA, 92626
Telephone Number	972-390-4016

Defendant No. 2

	Capital One Financial Corporation
Name	____ ("Capital One")
Job or Title	____ 1600 Capital One, Drive
(if known)	
Street Address	McLean,
City and County	
State and Zip Code	VA, 22102
Telephone Number	1-877-383-4802

Defendant No. 3

Name	____
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Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 Defendant No. 4
 Name _____
 Job or Title _____
 (if known)
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

15 U.S.C. 1681 et seq.-FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. 1681(b)-
~~Failure to follow reasonable procedures to assure maximum possible accuracy, 15~~
~~U.S.C. 1681i-Failure to conduct a reasonable reinvestigation of disputed information, 15~~
 U.S.C. 1681n-Willful noncompliance with FCRA, 15 U.S.C. 1681o-Negligent
 noncompliance with FCRA

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____. Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

~~Fair credit reporting act 15 U.S.C. 1681 et seq. Defendant, violated federal, consumer protection laws by reporting inaccurate, personal identifying information specifically and incorrect Social Security number on Credit profile. Capital one open an account using an incorrect Social Security number not belonging to plaintiff plaintiff notified capital one multiple times before about one failed to conduct your proper investigation instead simply removing the Social Security number and changing the account status to close by consumer capital one continue to furnish in accurate information to credit bureaus these violated 15.U.S.C. 1681s-2(b) and 15.US.C.1681i,1681e(b)~~

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

~~Actual damages in the amount of 250,000 pursuant to 15 U.S.C.1681n and/or 1680o TO COMPENSATE FOR EMOTIONAL DISGRACE, REPUTATIONAL HARM CREDIT, DENIAL, AND FINANCIAL IMPACT CAUSES BY DEFENDANT ACTION. STATUTORY DAMAGES OF UP TO\$1,000 Per violation pursuant to 15 U.S.C.1681n(a)(2) In a amount to be determined by the court or jury; Cost of action included court filing fees, reasonable attorney fees if applicable to 15 U.S.C. 1681n(a)(3)and1681o(a)(2); Any other relief, the court teams just and proper.~~

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 16, 2025.

Signature of Plaintiff

Printed Name of Plaintiff

Ramanda Mcmillan
Ramanda Mcmillan

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

E-mail Address